

## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi



United States of America

v.

Roland Jackson

Case No.

1:17mj 010-JCG

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2016 through August 2016 in the county of Harrison in the  
Southern District of MS, Southern Division, the defendant(s) violated:

*Code Section*

21 U.S.C. § 846

*Offense Description*

Conspiracy to Possess with Intent to Distribute a Controlled Substance, to wit, actual methamphetamine and cocaine hydrochloride, narcotic drug controlled substances.

This criminal complaint is based on these facts:

See affidavit attached hereto and incorporated herein

☒ Continued on the attached sheet.

Complainant's signature

Benjamin Taylor, Special Agent HSI/DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/09/2017City and state: Gulfport, MS

Judge's signature

John C. Gargiulo, United States Magistrate Judge

Printed name and title

**AFFIDAVIT**

STATE OF MISSISSIPPI  
COUNTY OF HARRISON  
SOUTHERN DISTRICT OF MISSISSIPPI

I, Benjamin M. Taylor, being first duly sworn, hereby depose and say that:

1. I, Special Agent Benjamin Taylor, am a duly sworn Special Agent with the U.S. Department of Homeland Security, Homeland Security Investigations (HSI). I am currently assigned to the Drug Enforcement Administration (DEA) High Intensity Drug Trafficking Area (HIDTA) Task Force, which is comprised of multiple federal, state, and local agencies. I have been specifically trained in the investigation and elements of federal crimes at the Federal Law Enforcement Training Center at Glynco, Georgia. I hold a Bachelor of Science degree in Criminal Justice and Political Science from the University of Southern Mississippi. I am also a graduate of the University of Southern Mississippi's Southern Regional Public Safety Institute where I received Law Enforcement Officer Certification by the Mississippi Board of Law Enforcement Officer Standards and Training. I have approximately sixteen years of experience as a law enforcement officer.

2. Beginning in January 2016, the DEA/HIDTA Task Force began receiving information from several sources of information indicating KEON HAWKINS was searching for a source of supply for cocaine hydrochloride. KEON HAWKINS negotiated with an undercover DEA agent to provide nine (9) pounds of methamphetamine "ice" and cash in exchange for five (5) kilograms of cocaine hydrochloride from the undercover DEA agent. The negotiations culminated on August 13, 2016 with the arrest of KEON HAWKINS, Michael DENHAM, and Sean UFLAND and the seizure of 9 pounds of methamphetamine "ice". During the arrest of MICHAEL DENHAM, agents observed **ROLAND JACKSON** fleeing the area in a vehicle. The methamphetamine was sent to the DEA

Laboratory where it was positive for methamphetamine and was weighed at 2638 grams actual methamphetamine.

3. Interviews with two cooperators (CS1 and CS2) revealed **ROLAND JACKSON** was a co-conspirator in the deal. Both cooperators indicated **ROLAND JACKSON** and **KEON HAWKINS** combined their money and traveled to Oakland, California, on August 9, 2016, to purchase 9 pounds of methamphetamine "ice" to exchange with the undercover DEA agents. CS1 stated he introduced **ROLAND JACKSON** and **KEON HAWKINS** to CS2, who introduced them to the source of supply in California. Intelligence research confirmed CS1 provided funds to purchase the airline ticket for **SEAN UFLAND**. CS1 stated he transported **ROLAND JACKSON** and **KEON HAWKINS** from the New Orleans International Airport on August 10, 2016. CS1 further stated he was instructed by **ROLAND JACKSON** to rent a room for **KEON HAWKINS** at Home 2 Suites on August 13, 2016.

4. CS2 stated on August 9, 2016, he flew from JFK International Airport in New York, New York, to San Francisco. CS2 stated he met **KEON HAWKINS** and **ROLAND JACKSON** at a Motel 6 in Oakland, California. CS2 further stated **KEON HAWKINS** and **ROLAND JACKSON** combined their money and ordered three (3) kilograms of methamphetamine "ice". CS2 stated once they obtained the methamphetamine "ice", **KEON HAWKINS** and **ROLAND JACKSON** did not want to return to the same hotel so they decided to rent a different room at Motel 6, located at Embarcadero Street in Oakland, California. CS2 stated **KEON HAWKINS** and **ROLAND JACKSON** packaged the methamphetamine "ice" and prepared it to ship to Mississippi via the U.S. Postal Service.

5. Agents administratively subpoenaed and received records from Spirit Airlines relating to the travel. Records returned from Spirit Airlines revealed **KEON HAWKINS** and **ROLAND**


**JACKSON** traveled on the same locator/itinerary from New Orleans International Airport to Oakland International Airport on August 7, 2016. Spirit Airlines records also revealed **KEON HAWKINS**, **SEAN UFLAND**, and **ROLAND JACKSON** traveled on the same locator/itinerary from Oakland International Airport to New Orleans International Airport on August 10, 2016.

6. Agents administratively subpoenaed and received records from Motel 6 and Home 2 Suites regarding the travel of **KEON HAWKINS**, **ROLAND JACKSON** and **SEAN UFLAND**. Records returned by Motel 6 revealed **KEON HAWKINS** and **ROLAND JACKSON** checked into the Motel 6-Oakland Airport #1015 on August 7, 2016 and checked out August 9, 2016. Records also revealed **KEON HAWKINS** and **ROLAND JACKSON** checked into Motel 6-Oakland Embarcadero #1080 on August 9, 2016 and checked out on August 10, 2016. Both **KEON HAWKINS** and **ROLAND JACKSON** provided their Mississippi Department of Public Safety Identification Cards upon check-in at Motel 6. Records returned by Home 2 Suites in Gulfport, Mississippi, revealed **MICHAEL DENHAM** rented a room on August 13, 2016.

7. Forensic analysis conducted on telephones and witnesses associated with this investigation reveal an ongoing conspiracy to transport narcotics to the Mississippi Gulf Coast via parcel services involving **KEON HAWKINS**, **SEAN UFLAND**, **ROLAND JACKSON** and **MICHAEL DENHAM**, and others, to include, but not limited to, text messages, wire transfers, bank deposits, and photographs, in months prior to the August 13, 2016 arrests. Flight records from various airlines confirm travel by **MICHAEL DENHAM** and **ROLAND JACKSON** from New Orleans International Airport to the Bay Area airports in California. Specific text messages include conversations between **MICHAEL DENHAM**, **ROLAND JACKSON**, and the source of supply concerning amounts of currency transfers, tracking numbers, and recipient names.

8. Based on the aforementioned facts and circumstances, your affiant believes that there is

probable cause to believe that **ROLAND JACKSON** has violated Title 21, United States Code, Section 846, *i.e* conspiracy to possess with intent to distribute in excess of 50 grams of actual methamphetamine and in excess of 5 kilograms of cocaine hydrochloride.

  
BENJAMIN M. TAYLOR  
SPECIAL AGENT  
Homeland Security Investigations  
(Assigned to) DEA/HIDTA Task Force

Sworn and subscribed before me  
this the 9 day of February 2017.

  
UNITED STATES MAGISTRATE JUDGE